

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BETTY ANNE WATERS, as)	
Administratrix of the Estate of)	
KENNETH WATERS,)	
Plaintiff,)	
))	
v.))	
))	
TOWN OF AYER, NANCY TAYLOR-) C.A. No. 04-10521-GAO	
HARRIS, in her individual capacity,)	
ARTHUR BOISSEAU, in his individual)	
capacity, BUDDY DECOT, in his)	
individual capacity, WILLIAM)	
ADAMSON, in his individual capacity,)	
PHILIP L. CONNORS, in his individual)	
capacity, an JOHN DOE AND JANE)	
DOES 1-16, in their individual capacities,)	
Defendants.)	
))	

**ASSENTED-TO MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTION TO COMPEL PRODUCTION
OF DOCUMENTS FROM MIDDLESEX DISTRICT ATTORNEY'S FILE**

Now comes the Office of the District Attorney for the Middlesex District and moves, with the assent of counsel for the plaintiff, for an extension of the time in which it must respond to the plaintiff's motion to compel for a period of fourteen (14) days, until and including September 15, 2006. As grounds for this motion, undersigned counsel states that she is handling the case in the absence of lead counsel for the Middlesex District Attorney's Office, who is currently out of the office on family leave. The additional time is needed in order for counsel to review the documents which are the subject of this motion and to prepare an appropriate response.

Counsel for the plaintiff has assented to the extension of time, and granting the requested

extension will not unduly delay the proceedings in this case nor cause prejudice to any party.

WHEREFORE, the Middlesex District Attorney's Office respectfully requests that this Court grant it an extension for fourteen days of the time in which it must respond to the plaintiff's motion to compel production of documents.

Respectfully submitted,

MIDDLESEX COUNTY DISTRICT
ATTORNEY'S OFFICE,

By their attorney,

THOMAS F. REILLY,
ATTORNEY GENERAL

/s/ Maura D. McLaughlin
Maura D. McLaughlin
Assistant Attorney General
Criminal Bureau
One Ashburton Place
Boston, Massachusetts 02108
(617) 727-2200, ext. 2857
BBO # 634932

Dated: September 1, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing pleading on counsel for all parties to this litigation.

/s/ Maura D. McLaughlin
Maura D. McLaughlin

Dated: September 1, 2006